

## **EXHIBIT 4**

**[REDACTED]**

**From:** Melissa J. Hogan melissajhogan@qavahlaw.com

**Subject:** Re: Hunt v. SBC - Subpoenas

**Date:** February 29, 2024 at 12:54 PM

**To:** Patrick Sanders patrick.sanders@macgilllaw.com

**Cc:** Dawn Stewart dawn@bozlawpa.com, Basyle Tchividjian boz@bozlawpa.com, Scott Murray Scott.Murray@macgilllaw.com, Elizabeth Merritt elizabeth.merritt@macgilllaw.com, Robert MacGill robert.macgill@macgilllaw.com

Just checking back in on this. We did not agree to accept service of subpoenas on behalf of our clients, so it would be good for us to connect, today if possible.

Melissa

On Feb 27, 2024, at 9:05 AM, Melissa J. Hogan <melissajhogan@qavahlaw.com> wrote:

Patrick,

Can we set up a time to discuss?

Melissa

**Melissa J. Hogan, Esq.**

**QAVAH LAW**

melissajhogan@qavahlaw.com

615.293.6623

On Feb 15, 2024, at 5:27 PM, Patrick Sanders <patrick.sanders@macgilllaw.com> wrote:

Boz and Melissa,

Attached are subpoenas for your clients. Please confirm you will accept service.

As we discussed, we would like to work with you on a mutually agreeable date and time for their depositions, as long as the depositions occur before March 15.

Best regards,

**Patrick Sanders**

Associate

MacGill PC

Patrick.Sanders@MacGillLaw.com

w: 317-961-5390

m: 317-670-1557

[www.MacGillLaw.com](http://www.MacGillLaw.com)

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**From:** Basyle Tchividjian boz@bozlawpa.com  
**Subject:** [REDACTED] Depositions  
**Date:** March 7, 2024 at 10:57 PM

BT

**To:** Robert MacGill robert.macgill@macgilllaw.com, Bundren, Brandon bbundren@bradley.com, Callas, Gretchen gcallas@jacksonkelly.com, Gene Besen gbesen@bradley.com, Gino Marchetti gmarchetti@tpmblaw.com, John Jacobson JJacobson@rjfirm.com, Kathy Klein KKlein@rjfirm.com, Matt Pietsch matt@tpmblaw.com, Nokes, Scarlett snokes@bradley.com, Patrick Sanders patrick.sanders@macgilllaw.com, Scott Klein Klein@mintzandgold.com, Scott Murray Scott.Murray@macgilllaw.com, Steve Mintz mintz@mintzandgold.com, Terence McCormick McCormick@mintzandgold.com, Thomas J. Hurney, Jr. - Jackson Kelly PLLC (thurney@jacksonkelly.com) thurney@jacksonkelly.com, Melissa J.Hogan melissajhogan@qavahlaw.com

Rob -

Welcome back from vacation world. Ms. Hogan and I can speak with you on Tuesday morning at 9 am CST (10 EST). We're fine if the entire gang here wants to join us - sometimes the more the merrier, but I'm not so sure with this group. Whatever you all wish to do works for us.

Finally, please copy Ms. Hogan when communicating with me. This is not the first time your office has failed to include her. As you well know, she is our local counsel. It's the appropriate and respectful thing to do. Thank you.

We anticipate receiving your confirmation for Tuesday's call.

Peace

Boz



**Boz Tchividjian, Esq.**

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**From:** Robert MacGill <robert.macgill@macgilllaw.com>

**Sent:** Thursday, March 7, 2024 7:08 PM

**To:** Basyle Tchividjian <boz@bozlawpa.com>; Bundren, Brandon <bbundren@bradley.com>; Callas, Gretchen <gcallas@jacksonkelly.com>; Gene Besen <gbesen@bradley.com>; Gino Marchetti <gmarchetti@tpmblaw.com>; John Jacobson <JJacobson@rjfirm.com>; Kathy Klein <KKlein@rjfirm.com>; Matt Pietsch <matt@tpmblaw.com>; Nokes, Scarlett <snokes@bradley.com>; Patrick Sanders <patrick.sanders@macgilllaw.com>; Scott Klein <Klein@mintzandgold.com>; Scott Murray <Scott.Murray@macgilllaw.com>; Steve Mintz <mintz@mintzandgold.com>; Terence McCormick <McCormick@mintzandgold.com>; Thomas J. Hurney, Jr. - Jackson Kelly PLLC (thurney@jacksonkelly.com) <thurney@jacksonkelly.com>

**Subject:** [REDACTED] Depositions

Counsel,

I have returned from some vacation time today and write to update you on our lack of progress with [REDACTED] testimony.

Attached below is an email exchange with [REDACTED] counsel this week.

We have been hoping for some measure of cooperation with counsel for [REDACTED] but have been unlucky. For instance, you see below delay on having a routine phone call.

Based on these circumstances, it is clear that [REDACTED] will not be appearing for a deposition next week. They seem to be insisting on being served personally. Please accept this email as our withdrawal of our notices for the depositions of [REDACTED] next week.

I have copied Boz on this email for his information. It is possible that Boz will participate in a call with us next week. If he does, we will

update you promptly on the discussion. Perhaps some of you are already having separate communications with Boz and had some advance notice of the circumstances.

For now, we will await another day for these depositions.

Best regards.

Robert D. MacGill  
MacGill PC  
156 E. Market St.  
Suite 1200  
Indianapolis, IN 46260  
317.442.3825  
Robert.MacGill@MacGillLaw.com

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----- Forwarded message -----

From: **Basyle Tchividjian** <[boz@bozlawpa.com](mailto:boz@bozlawpa.com)>

Date: Wed, Mar 6, 2024 at 2:40 PM

Subject: Re: Call tomorrow

To: Robert MacGill <[robert.macgill@macgilllaw.com](mailto:robert.macgill@macgilllaw.com)>

CC: Patrick Sanders <[patrick.sanders@macgilllaw.com](mailto:patrick.sanders@macgilllaw.com)>, Melissa J.Hogan <[melissajhogan@qavahlaw.com](mailto:melissajhogan@qavahlaw.com)>

Rob –

On February 27<sup>th</sup>, Ms. Hogan wrote to Patrick on February 27<sup>th</sup> asking to set up a time to speak with you all. After not hearing back from him, she followed up another email on February 29<sup>th</sup> and we still did not hear from you or your team.

I am busy for the rest of the week on a handful of out of state mediations. I will get with Ms. Hogan and we'll get back with you on some available dates to chat next week.

Lastly, as previously mentioned by Ms. Hogan, our offices have never agreed to accept service of your deposition subpoenas. As you know, the fact that they were unilaterally emailed to us does not equate effectuated service.

Boz



**Boz Tchividjian, Esq.**  
**BozLaw PA**

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**From:** Robert MacGill <[robert.macgill@macgilllaw.com](mailto:robert.macgill@macgilllaw.com)>  
**Date:** Wednesday, March 6, 2024 at 2:00 PM  
**To:** Basyle Tchividjian <[boz@bozlawpa.com](mailto:boz@bozlawpa.com)>  
**Cc:** Patrick Sanders <[patrick.sanders@macgilllaw.com](mailto:patrick.sanders@macgilllaw.com)>  
**Subject:** Call tomorrow

Boz,

We would like to discuss [REDACTED] depositions.

May we have a call at 9 am eastern time?

Best regards.

Robert D. MacGill  
MacGill PC  
Inland Building  
[156 E. Market St.](#)  
[Suite 1200](#)  
[Indianapolis, IN 46204](#)  
W: 317-961-5085  
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[Robert.MacGill@MacGillLaw.com](mailto:Robert.MacGill@MacGillLaw.com)  
[https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_www.MacGillLaw.com&d=DwICAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A\\_CdpqnVfiiMM&r=oLzuRgyACefS8K439NUENDIX6XeQfcGl89zuNSc8nN4&m=QgnWKsOFumAoeU0hREJFX8u8jaMINNyZu0HnfYL-Hnp5VeDrHBGx6p8VFjpkpU8q&s=\\_3rKEQo-aEQCj7PejWYe\\_K4xmOZEErZ02Fimn72\\_WY&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.MacGillLaw.com&d=DwICAg&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpqnVfiiMM&r=oLzuRgyACefS8K439NUENDIX6XeQfcGl89zuNSc8nN4&m=QgnWKsOFumAoeU0hREJFX8u8jaMINNyZu0HnfYL-Hnp5VeDrHBGx6p8VFjpkpU8q&s=_3rKEQo-aEQCj7PejWYe_K4xmOZEErZ02Fimn72_WY&e=)

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